

**International Residential Code  
Family Home Child Care  
Testimony Summaries**

**Written Testimony**

Date Received	Testimony From	Position	Summary
Thursday, October 19, 2023	<a href="#">Dave Kokot</a>	Pro Changes Proposed Option 1	During development of the proposed language in the CR-102, comparisons were made to I-4 and E occupancy requirements and that these occupancies would not require sprinklers if there were 50 or less children present. While technically correct this view neglects to consider the presence of a residence. Looking at IBC/IFC 903.2 a sprinkler would be required in these uses if a residence is present. The recommendation to allow more than 12 children in a family home childcare use is recognized as an increased hazard compared with current limits. Overall TAG member did not recognize the exception to sprinklers as equivalent to protection provided by sprinklers. It is clear there exists a childcare shortage. Reducing life safety to address the shortage is not the solution. Please consider the position of the TAG recommendation, adopt option 1.
Thursday, January 11, 2024	<a href="#">Erin Haick</a>	Pro Changes Proposed Option 2	Our Union SEIU has worked over the past year to develop the language proposed in the CR-102. Pre-Pandemic it was estimated that 500,00 children were without access to licensed child care. The number is likely larger now due to the effect of the pandemic. Licensed care is safer care. Wages in this industry are the minimum and operators take home \$9-\$12 an hour after expenses. Allowing an exception for the installation of sprinklers is critical for allowing some providers to continue to offer care for more than 12 children. Please adopt option 2.

Thursday, January 11, 2024	<a href="#">Ardel Jala</a>	Pro Changes Proposed Option 2	This Testimony Supports Option 2 of the proposed Changes. The sprinkler exception is similar to the exception for daycares in the International building Code. Having the sprinkler exception allows for a building official to account for local condition and say yes or no based on their judgement of the hazard. The Department of Children Youth and Family which licenses these uses conducts annual inspections, which will increase safety of these licensed uses. The original legislation , Senate Bill 5237 recognizes the shortage of available childcare in Washington. DCYF is issuing wavers to licensed facilities allowing more than 12 children. Providers want projects reviewed using the residential code, because cost of compliance otherwise is prohibitive. The testimony also wished to express overall support for the modifications proposed be it option 1 or option 2.
Friday, January 12, 2024	<a href="#">Jon Siu</a>	Pro Changes proposed with modification	This testimony wishes to support proposed language containing the exception to R331.2.2. Without the exception cost may prevent opening of such childcare uses. Jon has suggested language revisions. Modification suggested to section R331.1 is editorial and intends to clarify language. Modification suggested for Section 331.2.1 is editorial and intends to clarify language. Comment on Section R331.2.2 questions the intent of exceptions 1, 2, and 3. Suggested language modifications would change the regulatory effect of the proposed CR-102 language.
Friday, January 12, 2024	<a href="#">Anjali Grant</a>	<b>Pro</b> changes proposed in CR-102	In Washington there is a scarcity of childcare. A large portion of the childcare available in rural areas is via the Family Home Child Care use. Spaces for childcare need to be safe, but there are circumstances where additional flexibility would give small rural communities the ability to better serve their citizens

## Oral Testimony From Hearing 1/12/24

[Hearing Recording Link](#)

Date Received	Testimony From	Position	Summary
Friday, January 12, 2024	Anjali Grant	Pro changes proposed in CR-102	Trancript sent in and included in written testimony section
Friday, January 12, 2024	Ken Brouillette	Pro Changes Proposed Option 1	Representing Seattle Fire Dept and Fire Marshall's Office. They are in support of option 1 only.
Friday, January 12, 2024	Todd Short	Pro Changes Proposed Option 1	<p>As a member of the fire service and a part of the Residential TAG We support Option 1 requireing fire sprinklers. They are automatic and provide additional time for occupants to evacuate safely. Option two would allow for sprinklers to not be installed, and we are not in favor of this option. We feel that the decicion to allow an increase above 12 should not be at the local level and the code should make it clear. We do not believe the provisions included in option 2 mitigate the hazard of not having a sprinkler in a Family Home Child Care use. With limited adult intervention evacuation of all occupants may be difficult in a stressful situation. Flashover is happening faster and faster sometimes in the 2 -4 minute range. The evacuation time rquirement of 2 minutes is too short. The TAG was compelled to only allow increase of more than 12 children if sprinklers were present. A similar allowance was made for adult family homes increasging from 6 to 8 beds. this increase was only allowed because sprinklers are required without exception. Only approve option 1.</p>

Friday, January 12, 2024	Tyler Farmer	Pro Changes Proposed Option 2	<p>Representing the Department of Children Youth and Family. Thank you for contemplating changes for family home child care. We are in support of option 2. In 2021 the Fair Start fo Kids Act created a waiver for a licensing cap to allow more than 12 children in a family home child care use. We are adding a some fairly robust safety requirements when a waiver is in place, and we are limiting a waiver to only 16 children. The draft rule changes are important to us. It is recognized that sprinklers are a benefit, but they are also expensive. Small businesses may not be able to handle this expense. We consider the option 2 exceptions for the requirement of sprinklers critical to this change. The eception is very specific and the alternatives still provide very strong health and safety measures. If option 1 is adopted, family home child care facilities will likely not get the benefit of licensing and become unlicensed facilities with no oversight due to the cost of a sprinkler system. Adopt Option 2.</p>
Friday, January 12, 2024	Karen Christiansen	Pro Changes Proposed Option 2	<p>Representing the Department of Children Youth and Family. Safety is the biggest priority in our department. We have worked on the development of this proposed language and feel that option 2 strikes a balance between safety for kids and the cost of a sprinkler system. We are finding many illegal unlicensed childcare providers with no safety requirements or oversight. We support Option 2 I echo Tylers points sprinklers are a deal breaker for the people seeking a waiver to increase childcare availability. DCYF has added measures into the capacity waiver to increase safety as well such as no overnight care with a capacity waiver. There will be timed drills for providers also a document will be required from local jurisdictions showing compliance with these building code provisions. Adopt Option 2</p>